

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

THE AUTHORS GUILD, WILLIAM  
GOLDSTEIN, ELIZABETH KADETSKY,  
VALERIE ORLANDO, KATALIN BALOG,  
BENJAMIN HOLTZMAN, LEE JASPERSE,  
and NICOLE JENKINS, on behalf of themselves  
and all others similarly situated,

Plaintiffs,

v.

NATIONAL ENDOWMENT FOR THE  
HUMANITIES, et al.,

Defendants.

Case No. 1:25-cv-03923

Consolidated with No. 1:25-cv-03657

**[PROPOSED] ORDER GRANTING PRELIMINARY INJUNCTION**

The Court, having reviewed the parties' filings, it is hereby **ORDERED** that Plaintiffs' Motion for a Preliminary Injunction is GRANTED. It is further

**ORDERED** that Defendants are preliminarily enjoined from enforcing or giving effect to the mass termination notices issued to individual and organizational National Endowment for the Humanities grantees between April 1 and April 5, 2025, including the termination notices issued to Plaintiffs and their members; and it is further

**ORDERED** that Defendants are preliminarily enjoined from taking any similar future action terminating or effectively terminating, contrary to statute, regulations, and the Constitution, duly awarded individual and organizational National Endowment for the Humanities grants; and it is further

**ORDERED** that Defendants and their agents are preliminarily enjoined from re-obligating funds used to support the covered grants; and it is further

**ORDERED** that Defendants and their agents take all steps necessary to ensure that the National Endowment for the Humanities disburses funds on covered grants in the customary manner and in customary timeframes.

Nothing in this Order prohibits Defendants from terminating any of the covered grants for permissible reasons and in accordance with law.

Dated: \_\_\_\_\_

\_\_\_\_\_  
The Honorable Colleen McMahon  
United States District Judge